

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF TENNESSEE

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KIM KING and  
DARREN KING  
PLAINTIFFS

V.

NO: 2:22-CV-2030-JPM-atc

WILLIAM CHASE JR  
DEFENDANT

STATEMENT OF MATERIAL UNDISPUTED FACTS IN SUPPORT OF PLAINTIFF'S  
MOTION FOR PARTIAL SUMMARY JUDGMENT

1. On Saturday, November 24, 2018, Chase left Santa Rosa Beach, Florida to return to Arkansas. DE 9-1 Page ID 61. Santa Rosa Beach is South of Panama City, Florida. Id.
2. The driving time between Santa Rosa Beach and Memphis is ten (10) hours. DE 9-1 Page ID 67
3. The collision with King occurred about 4 or 5 p.m. DE 9-1 Page ID 62.
4. Chase was on I-240 headed towards Arkansas. DE 9-1Page ID 69.
5. Chase was traveling 55 miles per hour, DE 9-1, Page ID 70, and when he first saw King she was 2 car lengths or 20 feet in front of him. DE DE 9-1 Page ID 70.
6. Chase admitted that he could not stop in time and slammed into King. DE 9-1 Page ID 69. Chase also admitted to Darren King he tried to stop. DE 9-3 Page ID 249.
7. Chase admitted that he did not see the John Doe vehicle before hitting King. DE 9-1 Page ID 70-71.

8. Chase admitted he had no idea what the John Doe vehicle was doing before striking King. DE 9-1 Page ID 71. Chase also admitted he has no idea who the John Doe driver is.  
*Id.*

9. Chase testified that he was looking directly in front of him DE9-1, Page ID77, with a clear line of sight and no obstructions, DE9-1, Page ID77.

Respectfully Submitted,

/S/DRAYTON D. BERKLEY  
**DRAYTON D. BERKLEY, ESQ.**  
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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies a copy of the foregoing has been served upon counsel for the defendants in the U.S. Mail, first class postage paid, or e-mail and properly addressed or hand-delivery to:

Chris Frulla  
Rainey Kizer  
50 North Front Street  
Memphis, TN 38103

This the 21st day of March 2022.

/S/DRAYTON D. BERKLEY  
**DRAYTON D. BERKLEY**